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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

2021 TOYOTA TRD 4RUNNER,
VIN: JTEPU5JR4M5948693, LICENSE
NUMBER: 8XXF463 and

2022 MERCEDES BENZ AMG CLA 4MATIC,
VIN: W1K3G4EB0NJ364663, LICENSE
NUMBER: 9BYD950,

Defendants.

2:23-MC-00350-DJC-DB

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimants Michael W. Bowden, Kasandra Dolan, and Michael J. Bowden (“claimants”), by and through their respective counsel, as follows:

1. On or about June 26, 2023, claimants Michael W. Bowden, Kasandra Dolan, and Michael J. Bowden filed claims in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the above-referenced vehicles (hereafter “defendant vehicles”), which were seized on March 23, 2023.

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any

1 person to file a claim to the defendant vehicles under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
2 than claimants has filed a claim to the defendant vehicles as required by law in the administrative
3 forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant vehicles and/or to obtain an indictment alleging that the defendant
6 vehicles are subject to forfeiture within ninety days after a claim has been filed in the administrative
7 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
8 parties. That deadline is September 22, 2023.

9 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
10 November 21, 2023, the time in which the United States is required to file a civil complaint for forfeiture
11 against the defendant vehicles and/or to obtain an indictment alleging that the defendant vehicles are
12 subject to forfeiture.

13 5. Accordingly, the parties agree that the deadline by which the United States shall be
14 required to file a complaint for forfeiture against the defendant vehicles and/or to obtain an indictment
15 alleging that the defendant vehicles are subject to forfeiture shall be extended to November 21, 2023.

16 Dated: 9/20/2023

PHILLIP A. TALBERT
United States Attorney

18 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

21 Dated: 9/18/2023

/s/ Candice Fields
CANDICE FIELDS
Attorney for potential claimants Michael J Bowden,
Michael W. Bowden, and Kasandra Dolan
(Authorized by email)

25 **IT IS SO ORDERED.**

27 Dated: September 21, 2023

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE